

LEWIS BRISBOIS BISGAARD & SMITH LLP

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Attorney for Defendants

Southwest Concrete Pumping, LLC;

Jordana Buchanan; Zachary Buchanan;

Top Water Holdings, LLC; Lillibeth Benavides;

AEB Enterprises

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CURTIS LUX, an individual; JUSTIN
HYMES, an individual; KATHY
WADKINS, an individual; MICHAEL
BATES, an individual; AARON
MATHIS, an individual; RICK
GORDON, an individual; ISHMEL
BYRD, an individual;

Plaintiffs,

vs.

JORDANA BUCHANAN, an
individual; ZACHARY BUCHANAN,
an individual;
ALLAN BENAVIDES, a.k.a ALLAN
GLICKSTEIN, an individual;
LILLIBETH BENAVIDES, an
individual; SOUTHWEST CONCRETE
PUMPING, LLC, a Nevada Limited
Liability Company; AEB
ENTERPRISES, LLC, A Nevada
Domestic Limited Liability Company;
ACJ CONSULTING, LLC, A Nevada
Domestic Limited Liability Company;
TOP WATER HOLDINGS, LLC, A
Nevada Domestic Limited Liability
Company; DOES I-X, unknown
individuals; ROES I-X, unknown
corporate entities and/or business
entities,

Defendants.

CASE NO. 2:23-cv-00839-MMD-NJK

**~~PROPOSED~~ STIPULATION AND ORDER
TO EXTEND TIME TO FILE RESPONSE
TO PLAINTIFFS' MOTIONS TO COMPEL
DEFENDANTS SOUTHWEST CONCRETE
PUMPING LLC AND ALLAN BENAVIDES
TO RESPOND TO REQUESTS FOR
PRODUCTION OF DOCUMENTS
[ECF No. 72 & 74]**

1 Defendants JORDANA BUCHANAN, ZACHARY BUCHANAN, ALLAN
2 BENAVIDES, LILLIBETH BENAVIDES, and SOUTHWEST CONCRETE
3 PUMPING, LLC (“Defendants”) by and through their attorneys of record, LEWIS
4 BRISBOIS BISGAARD & SMITH, LLP hereby Stipulate with Plaintiffs CURTIS
5 LUX, KATHY WADKINS, AARON MATHIS, RICK GORDON, AND ISHMAEL
6 BYRD (“Plaintiffs”) by and through their attorneys of record, MULLINS &
7 TRENCHAK, to stipulate to extend the time Defendants have to Respond to Motions
8 To Compel Defendant Southwest Concrete Pumping LLC and Allan Benavides To
9 Respond To Requests for Production of Documents [ECF Doc. 72 & 74] from
10 January 16, 2024 to January 30, 2024.

11 Counsel for Defendants is experiencing a post-cataract operation eye infection
12 and is unable to read and type. *See* doctor’s note attached hereto as Exhibit A.

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1 This stipulation is being entered in Good Faith. This stipulation is not being
2 enter into for the purpose of unnecessary delay.

3 **IT IS SO STIPULATED.**

4 DATED this 12th day of January 2024

DATED this 12th day of January 2024

5 LEWIS BRISBOIS BISGAARD &
6 SMITH LLP

Mullins & Trenchak

7 /s/ Jeffrey D. Winchester

/s/ Phillip J. Trenchak

8 JEFFREY D. WINCHESTER, ESQ.

PHILIP J. TRENCHAK, ESQ.

9 Nevada Bar No. 10279

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11 Las Vegas, Nevada 89118

Las Vegas, NV 89104

Attorneys for Defendants

Attorneys for Plaintiffs

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13 **ORDER**

14 IT IS SO ORDERED.

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18 UNITED STATES DISTRICT COURT
19 MAGISTRATE JUDGE
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